

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:24CV327
Plaintiff,	:	
	:	
v.	:	
	:	
177 WESTFIELD DRIVE, ROCKINGHAM,	:	
RICHMOND COUNTY, NORTH CAROLINA,	:	
WITH ALL APPURTENANCES AND	:	
IMPROVEMENTS THEREON,	:	
Defendant.	:	

**VERIFIED COMPLAINT OF FORFEITURE**

NOW COMES Plaintiff, United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action in rem brought to enforce the provisions of 21 U.S.C. § 881(a) for forfeiture of the aforesaid defendant real property which was used or intended to be used in any manner or part to commit or to facilitate the commission of a violation of the Controlled Substances Act, 21 U.S.C. §§ 801 et seq., punishable by more than one year's imprisonment, or which constitutes proceeds traceable to the exchange of a controlled substance in violation of the Controlled Substances Act.

2. This action is also brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(A) and (C) for the forfeiture of the aforesaid defendant real property which was involved in transactions or attempted transactions in violation of Title 18, United States

Code, Section 1956 or 1957, or constitutes or was derived from proceeds traceable to an offense constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), or a conspiracy to commit such offense, specifically the exchange of a controlled substance in violation of state and federal law.

3. The defendant property is all that certain lot or parcel of land known as 177 Westfield Drive, Rockingham, Richmond County, North Carolina, with all appurtenances and improvements thereon, more particularly described as follows:

BEING all of Lot 26R and all of Areas "A" as shown on that survey entitled "Survey for Habitat for Humanity of the NC Sandhills, Lot 26R & Lot 27R, Meadowood, Recombination Plan Survey, Wolfpit Township, Richmond County, Rockingham, North Carolina" dated April 16, 2021 prepared by Ryan McBryde Land Surveying and Planning and recorded in Plat Book 807, Page T of the Richmond County Public Registry.

(See Exhibit A-1 attached hereto). The record title holder of the subject real property is Adam Meland. The property was acquired by Adam Meland on or about May 9, 2023, by North Carolina General Warranty Deed recorded in the Richmond County Register of Deeds at Book 1965, Pages 296 - 298.

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant real property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has venue pursuant to 28 U.S.C. § 1355(b)(1) and 1395.

6. The defendant real property has not been seized but is located in this district,

and one or more of the acts giving rise to forfeiture occurred in this district. The United States of America does not request authority from the Court to seize the defendant property at this time. The United States will, as provided by 18 U.S.C. § 985(b) and (c)(1):

- a. post notice of this action and a copy of the Complaint on the defendant real property;
- b. serve notice of this action on the defendant real property's owner and any other person or entity who may claim interest in the defendant real property; and
- c. file a Lis Pendens in the county records of the property status as a defendant in this action.

7. The facts and circumstances supporting the seizure and forfeiture of the defendant real property are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that judgment be entered declaring the defendant real property be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

This the 16<sup>th</sup> day of April, 2024.

Respectfully submitted,

SANDRA J. HAIRSTON  
United States Attorney

/s/ Lynne P. Klauer  
Lynne P. Klauer  
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## **VERIFICATION**

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Verified Complaint of Forfeiture are true and correct to the best of my knowledge, information and belief.



Jeffrey Gruppo  
Special Agent  
U.S. Food and Drug Administration,  
Office of Criminal Investigations